favor of a prisoner unless he is confined in violation of the Constitution, laws, or treaties of the United States. U. S. COMP. STAT., § 753. This broad language has been rather narrowly construed, and it is now well settled that the writ of *habeas corpus* will not perform the functions of a writ of error. See *Henry* v. *Henkel*, 235 U. S. 219, 229. It will only lie if the proceedings in the committing tribunal are void or show lack of jurisdiction over the parties or the subject matter of the action. *Ex parte Siebold*, 100 U. S. 371; *Ex parte Parks*, 93 U. S. 18. See *Henry* v. *Henkel*, *supra*. Where the denial of a right guaranteed by the Constitution involves an error of procedure or even vitiates the mode of trial, *habeas corpus* is not the proper remedy. So the denial of the right to have a jury of one's peers and to have compulsory process in order to obtain favorable witnesses will not be reviewed on *habeas corpus*. *Ex Parte Harding*, 120 U. S. 782. Likewise the claim of double jeopardy will not be investigated on *habeas corpus*. *Ex parte Bigelow*, 113 U. S. 328. Accordingly, the principal case seems clearly right.

HUSBAND AND WIFE — RIGHTS AND LIABILITIES OF WIFE AS TO THIRD PARTIES — HUSBAND'S CREDITORS' RIGHTS IN SEPARATE ESTATE MANAGED BY HUSBAND — PRESUMPTIONS. — A business, bought with his wife's money, was managed by an insolvent debtor, on a salary as her agent. No evidence as to the disposition of the salary was offered. A prior creditor seeks to charge the business. *Held*, that the profits are chargeable to the extent of his salary. *Fisher* v. *Poling*, 88 S. E. 851 (W. Va.).

Transactions between an insolvent debtor and his wife have always been subject to exceptional scrutiny. *White* v. *Benjamin*, 150 N. Y. 258, 265, 44 N. E. 956, 958. Indeed, in such cases a wife must sustain the burden of disproving fraud in conveyances to her. *Pope* v. *Cantwell*, 206 Fed. 908; *Edelmuth* v. *Wybrant*, 21 Ky. Law 929, 53 S. W. 528. *Contra*, *Clark Bros.* v. *Ford*, 126 Ia. 460, 102 N. W. 421. Thus the presumption in the principal case that the husband's salary, being unaccounted for, must be in the business is not in principle an innovation. Indeed, this same court and others have charged the business profits for creditors where the husband's services were gratuitous. *Boggess* v. *Richards' Adm'r*, 39 W. Va. 567, 20 S. E. 599; *Glidden* v. *Taylor*, 16 Oh. St. 510. *Contra*, *Shircliffe* v. *Casebeer*, 122 Ia. 618, 98 N. W. 486; *Wasem* v. *Raben*, 45 Ind. App. 221, 90 N. E. 636. However, some courts have given as the basis for such result the assertion that the husband's industry cannot equitably be withheld from his creditors. *Patton's Exr.* v. *Smith*, 130 Ky. 819, 114 S. W. 315. Such decisions must likewise rest on a presumption, that the business, after all, is that of the husband. *Cf. Robinson* v. *Brems*, 90 Ill. 351; *Talcott* v. *Arnold*, 54 N. J. Eq. 570, 35 Atl. 532. In the principal case, the salary itself satisfied the creditors. But it would be of interest to know whether the court, on the principle of these cases of gratuitous labor, would have charged the profits if the salary had not sufficed.

INJUNCTIONS — LEGISLATIVE ABOLITION OF THE INJUNCTIVE REMEDY IN LABOR DISPUTES UNCONSTITUTIONAL. — The defendants, members of a trade union desirous of forcing the plaintiffs to join, brought pressure on the latters' employers to compel them to discharge the plaintiffs. A statute provided that no injunction should issue in such case. *Held*, the statute violates the Fourteenth Amendment of the Constitution of the United States, and an injunction will therefore issue. *Bogni* v. *Perotti*, 203 Mass. 26, 112 N. E. 853.

For discussion of this case, see NOTES, p. 75.

INSURANCE — MUTUAL BENEFIT INSURANCE — RIGHT OF SOCIETY TO RAISE PREMIUMS. — Plaintiff took out a certificate of insurance from a fraternal order under a by-law of the association which provided that "monthly pay-